



## Fact Sheets and Information Papers

### Organic Air Emission Standards for Containers

March 2005

Background: The EPA has promulgated a final rule designed to control volatile organic compounds (VOCs) emissions from tanks, surface impoundments, and containers. Emissions of VOCs must be controlled if the hazardous waste placed in these units contains an average VOC concentration of greater than or equal to 500 parts per million by weight (ppmw). Typical waste streams that could possibly generate a VOC concentration of > 500 ppmw include used solvents, paints, and contaminated fuels. This rule, which became effective December 6, 1996, applies to owners and operators of treatment, storage and disposal facilities (TSDFs), as well as generators who accumulate waste at a 90-day storage site. The citation for the regulation is 40 CFR 264 and 265, Subpart CC. This paper will only address standards for containers. The most common container is the 55-gallon drum. However, a container can be any portable device in which hazardous waste is stored; including dumpsters, tank trucks, railcars and roll off boxes.

General Applicability: A determination of the VOC concentration of a hazardous waste is required only when the waste is placed in a container that does not use air emission controls in accordance with Subpart CC requirements. Either direct measurement or knowledge of the waste can be used to determine the VOC concentration of a hazardous waste. Not all containers are subject to these new regulations. The following units are completely exempt from the rule:

- Containers with a capacity equal to or less than 26 gallons.
- Containers of any size located at satellite accumulation points.
- Containers used by Small Quantity Generators

Containers that are not included in the above list must be equipped with a cover that meets the "No detectable organic emissions" standard when all openings are closed and sealed. The owner/operator must determine that the container is not leaking by utilizing Method 21 in 40 CFR Part 60, Appendix A. Method 21 essentially requires that a portable instrument equipped with a gas pump and probe is used to detect organic emission concentrations at the surface of any component where a leak may occur. In addition, monitoring and record keeping requirements must be maintained to ensure compliance.

Meeting Container Control Requirements: The regulation states that the following types of containers will automatically meet the "no detectable organic emissions" standard:

- Containers with a design capacity under 119 gallons (equipped with covers) that comply with Department of Transportation (DOT) regulations on packaging hazardous waste for transport under 49 CFR 178.
- Containers with a design capacity under 119 gallons equipped with a cover and closure device that forms a continuous barrier over the container openings with no visible holes, gaps or open spaces.

- Containers having an organic vapor-suppressing barrier (e.g organic vapor suppressing foam) placed on or over the material in an open top container so that the material is not exposed to the atmosphere.
- Containers, covers and closure devices shall be visually inspected initially and annually thereafter. Leak detection monitoring and record keeping requirements are not required with any of the above containers.

State Authorization: This final rule is promulgated under the provisions of the Hazardous and Solid Waste Amendments (HSWA). Therefore EPA will initially administer it in all states. States may obtain authorization to administer the requirements of these regulations by modifying their hazardous waste programs to adopt the rule.

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[Back to Fact Sheet Page](#)